

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Francisco Mejia (“Mejia”) and Defendant Big League Advance Fund I, L.P. (“BLA”), do hereby stipulate and agree that all claims and counterclaims in this action are dismissed with prejudice. With the exception of the portion of BLA’s attorneys’ fees Mejia has agreed to pay BLA to resolve its counterclaims against Mejia, each party shall bear its own costs, expenses, and attorneys’ fees.

*Of Counsel:*

Anthony G. Buzbee  
Texas Bar No. 24001820  
tbuzbee@txattorneys.com  
Peter K. Taaffe  
Texas Bar No. 24003029  
ptaaffe@txattorneys.com  
Crystal Del Toro  
cdelatoro@txattorneys.com  
Texas Bar No. 24090070  
THE BUZBEE LAW FIRM  
JP Morgan Chase Tower  
600 Travis, Suite 7300  
Houston, Texas 77002

YOUNG CONAWAY STARGATT  
& TAYLOR, LLP

/s/ Pilar G. Kraman  
Richard A. DiLiberto, Jr. (#2429)  
Martin S. Lessner (#3109)  
Pilar G. Kraman (#5199)  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
(302) 571-6600  
rdiliberto@ycst.com  
mlessner@ycst.com  
pkraman@ycst.com

*Attorneys for Plaintiff for the limited and exclusive purpose of filing this Stipulation and Proposed Order.*

*Of Counsel:*

Marc Zwillinger  
Jeffrey Landis  
Nury Siekkinen  
ZWILLGEN PLLC  
1900 M St. NW, Ste. 250  
Washington, DC 20036  
(202) 706-5203  
marc@zwillgen.com  
jeff@zwillgen.com  
nury@zwillgen.com

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon  
Philip Trainer, Jr. (#2788)  
Tiffany Geyer Lydon (#3950)  
500 Delaware Avenue, 8th Floor  
P.O. Box 1150  
Wilmington, DE 19899  
(302) 654-1888  
ptrainer@ashby-geddes.com  
tlydon@ashby-geddes.com

*Attorneys for Defendant*

Dated: August 31, 2018

Dated: \_\_\_\_\_, 2018

**SO ORDERED:**

---

United States District Court Judge